

EXHIBIT 23

Grace Chimene

April 26, 2022

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO)
ENTERO, et al.,)
)
Plaintiffs,)
) CIVIL ACTION
VS.)
) NO.: 5:21-cv-844-XR
GREGORY W. ABBOTT, et al.,)
)
Defendants.)
)

ORAL AND VIDEOTAPED DEPOSITION OF

GRACE CHIMENE

12 Designated Representative of League of Woman Voters of
13 Texas

APRIL 26, 2022

16 ORAL AND VIDEOTAPED DEPOSITION OF GRACE CHIMENE,
17 produced as a witness at the instance of the DEFENDANTS,
18 and duly sworn, was taken in the above-styled and
19 numbered cause on April 26, 2022, from 10:14 a.m. to
20 5:13 p.m. before Miah Parson, CSR in and for the State
21 of Texas, reported by oral stenography, at the
22 Disability Rights Texas offices, 2222 W. Braker Lane,
23 Austin, Texas 78758, pursuant to the Federal Rules of
24 Civil Procedure and the provisions stated on the record
25 or attached hereto.

Grace Chimene

April 26, 2022
Page 124

1 but also I think it may limit our -- or restrict the way
2 we currently hold candidate forums and do in-person
3 contact with voters who may have a ballot because of the
4 vagueness of the bill, my concern is that members and
5 volunteers may feel like they're going to get into
6 trouble and the criminal -- and be accused of vote
7 harvesting when actually they're just guiding people
8 through the vote process and they happen to have a
9 ballot with them. So I just wanted to be clear there
10 was a little addition, addendum.

11 Q. Yeah, I'd like to understand the addendum. Are
12 you aware that the vote harvesting provision of SB1
13 applies only to actions intended to deliver votes for a
14 specific candidate or measure?

15 MR. CLANCY: Objection; form.

16 A. Yes.

17 Q. (BY MR. THOMPSON) When the League hosts a Lake
18 candidate forum, for example, is it intending to deliver
19 voted for a specific candidate or measure?

20 A. It is not intending to, but what the perception
21 is occasionally is that people may think we are
22 supporting one candidate over another per se because
23 certain candidates don't show up at the candidate forum
24 and so the perception may be there and because of the
25 vagueness of the law I am very concerned about our

Grace Chimene

April 26, 2022
Page 125

1 members getting accused of something about -- regarding
2 vote harvesting.

3 Q. Right. I want to -- I want to make sure I
4 understand the concern --

5 A. Okay.

6 Q. It sounds like the concern is that the League
7 and its members could be falsely accused of violating
8 the vote harvesting provision, correct?

9 MR. CLANCY: Objection to the extent it
10 misstates the testimony or calls for a legal conclusion.

11 A. I'm not a lawyer. I don't understand it
12 completely. I -- I am concerned about the impact of our
13 work, educating voters may be construed as some people
14 say sometimes that we are trying to promote one
15 candidate over another.

16 Q. (BY MR. THOMPSON) Let me try to reword again.

17 A. Okay.

18 Q. Is it a concern you're describing a concern
19 that the League and its members would be accused of
20 violating the vote harvesting provisions of SB1, even
21 though they do not intend to deliver votes for a
22 specific candidate or measure?

23 MR. CLANCY: Objection; form.

24 A. Can you just say it again.

25 Q. (BY MR. THOMPSON) Sure. Is the concern that

Grace Chimene

April 26, 2022
Page 126

1 you're describing a concern that the League and its
2 members would be accused of violating the vote
3 harvesting provisions of SB1, even though they do not
4 intend to deliver votes for a specific candidate or
5 measure?

6 A. Yes.

7 Q. Okay. So will it be okay if I treat that as a
8 fifth way in which the vote harvesting provisions --

9 A. Sure. Thank you.

10 Q. Then our favorite time, we'll just go back
11 through 1 through 5 again and hopefully this time I'll
12 get them correct. Okay. We're talking about the 5 ways
13 you've testified that the League contends the vote
14 harvesting provisions of SB1 frustrates its mission.
15 First, the League contends that the vote harvesting
16 provisions of SB1 prevent some voters from participating
17 in elections, right?

18 A. Right.

19 Q. Second, the League tries to address that
20 problem by shifting resources from other activities to
21 educating people potentially subject to the vote
22 harvesting provisions about the vote harvesting
23 provisions, correct?

24 A. Yes.

25 Q. Third, despite the League's efforts, the League

Grace Chimene

April 26, 2022
Page 208

1 THE VIDEOGRAPHER: This concludes the
2 deposition for today. We are going off the record.
3 The. Time is 5:13 p.m.

4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25